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US EPA RECORDS CENTER REGION 5



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November 19, 2015

MEMORANDUM

SUBJECT: Clarification of Interim Remedial Actions to be taken at the
Lusher Street Groundwater Contamination Site

FROM: Karen Kirchner, Remedial Project Manager *KK*
Superfund Division

TO: File

On September 16, 2014, after considering and responding to public comments, EPA selected an interim remedy for the Lusher Street Groundwater Contamination Site (Site) in Elkhart, Indiana. Part of the remedy was to provide water hookups to homes located within the contaminated groundwater plume at the Site that were not already served by the municipal water system. EPA estimated that approximately 72 homes would be hooked up. EPA's Record of Decision (ROD) identifying the interim remedy recognized, however, that the actual number of homes might differ and would be further refined and verified during the remedial design and construction phases. (ROD pages 10, 34.)

The interim remedial actions are intended to address current threats in the short-term while the full nature and extent of the groundwater contamination is characterized. The objective of the interim remedy is to prevent human exposure to contaminants of concern in groundwater through ingestion, dermal contact, and inhalation above protective levels. (ROD pages 24-25.)

After issuing the ROD, EPA began negotiations with a number of potentially responsible parties (PRPs), seeking their agreement to implement and pay for the interim remedy. Those negotiations included discussion of the design process for the interim remedy. One outcome of those discussions was the need for EPA to document some refinements and clarifications to the interim remedy developed through further evaluation of remedial design issues. The purpose of this memorandum is to document these changes.

In particular, the remedial approach to be undertaken by the settling PRPs has been refined in regards to the small plume area located south of the main Site plume and east of the Gemeinhardt site plume. The Gemeinhardt site is a separate site, located south (and upgradient) of this Site, that is being addressed by the EPA emergency response program.

After discussing the remedial design approach and reevaluating the small plume area, EPA has decided to collect additional data on the nature and extent of the groundwater contamination in that area to refine the number and location of homes requiring water hookups under the interim remedy. The rest of the interim remedy (addressing the main plume area and the vapor intrusion remedy) will proceed under the Consent Decree with the PRPs while this supplemental pre-design investigation takes place.

Unlike the main plume, the small plume area is defined based on groundwater contamination found in a single sampling event. As the ROD notes, groundwater contamination in this area may move fairly rapidly. (See ROD page 8.) To make sure the interim remedy effectively protects all residences in the small plume area, it is important to make sure the current plume (and associated buffer area) is accurately defined. The additional sampling work may also more clearly identify the source(s) of the small plume, which is upgradient from the locations of the PRPs who will be performing the rest of the interim remedy. Therefore, gathering this additional information may also support EPA enforcement efforts at the Site.

Once the current nature and extent of the small plume is better defined, EPA expects to proceed with that portion of the interim remedy as planned, perhaps with small adjustments to the area of concern based on the pre-design investigation. If the additional data show that the small plume has dissipated or that the small plume is connected to the Gemeinhardt plume, EPA may consider issuing an Explanation of Significant Differences to modify the remedy selected in the September 2014 Interim ROD. EPA will advise the community of any proposed significant changes to the scope of the remedy.

Because the minor remedy adjustment described in this memorandum does not significantly alter the scope, performance, or cost of the selected interim remedy, no formal process under Section 300.435(c)(2) of the National Contingency Plan is required at this time.

EPA will, however, include information on these minor changes in a fact sheet and will conduct outreach activities for those residences potentially affected by the change in timing of the small plume area remedy. (See *A Guide to Preparing Superfund Proposed Plans, Records of Decision, And Other Remedy Selection Decision Documents* (July 1999) page 7-1: "Nonsignificant or Minor Changes usually arise during design and construction, when modifications are made to the functional specifications of the remedy to address issues such as performance optimization, new technical information, support agency/community concerns and/or cost minimization (e.g., value engineering process).")